EXHIBIT B

From:	Frank Hedin
To:	Tayman, Kyle
Cc:	Abbas Kazerounian; Jason Ibey; Pamela Prescott; dhall@hedinhall.com; Nicholas Barthel; jmorganroth@morganrothlaw.com; Brown, Brooks R; Hendriksen, Patrice E
Subject:	Re: Activity in Case 5:19-cv-00163-FMO-SP Amanda Hill v. Quicken Loans Inc. Minutes of In Chambers Order/Directive - no proceeding held
Date:	Wednesday, April 1, 2020 1:25:07 PM
Attachments:	image001.png

Kyle,

Confirming our agreement that neither our expert nor your rebuttal expert will discuss best
practices.

Frank S. Hedin

1395 Brickell Avenue, Suite 1140
Miami, Florida 33131
Tel: + 1 (305) 357-2107
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On Apr 1, 2020, at 8:47 AM, Tayman, Kyle <KTayman@goodwinlaw.com>
wrote:

Counsel,

Following-up on my email below, please let us know plaintiffs' position.

Best,
Kyle

From: Tayman, Kyle
Sent: Friday, March 27, 2020 5:18 PM
To: Frank Hedin <fhedin@hedinhall.com>; Abbas Kazerounian <ak@kazlg.com>; Jason
Ibey <jason@kazlg.com>; Pamela Prescott <pamela@kazlg.com>;
dhall@hedinhall.com; Nicholas Barthel <nicholas@kazlg.com>
Cc: jmorganroth@morganrothlaw.com; Brown, Brooks R <BBrown@goodwinlaw.com>;
Hendriksen, Patrice E <PHendriksen@goodwinlaw.com>
Subject: RE: Activity in Case 5:19-cv-00163-FMO-SP Amanda Hill v. Quicken Loans Inc.
Minutes of In Chambers Order/Directive - no proceeding held

Counsel,

In light of the Court's order for the parties to simultaneously submit direct
testimony by declaration on April 7, I am writing to confirm the agreement
reached at the February 28 evidentiary hearing regarding the direct
testimony of Mr. Young.

That agreement was that Plaintiffs will not put forth direct testimony from Mr. Young concerning "best practices" - that is, the section of his report beginning on page 9 titled "Best practice with regards to confirming a site visitor has consented to terms" - as Quicken Loans otherwise objects to that line of testimony on relevancy grounds. Please confirm by close of business on Monday that the parties remain in agreement and that Mr. Young's declaration will not include the "best practices" testimony.

I hope that everyone is well and healthy. Enjoy the weekend.

Best,
Kyle

W. Kyle Tayman
Partner
<image002.png>
Goodwin Procter LLP
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Washington, DC 20036
o +1 202 346 4245
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KTayman@goodwinlaw.com | goodwinlaw.com <image004.png>
<image006.png> <image008.png>

From: cacd_ecfmail@cacd.uscourts.gov <cacd_ecfmail@cacd.uscourts.gov>
Sent: Wednesday, March 25, 2020 3:39 PM
To: ecfnef@cacd.uscourts.gov
Subject: Activity in Case 5:19-cv-00163-FMO-SP Amanda Hill v. Quicken Loans Inc. Minutes of In Chambers Order/Directive - no proceeding held

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

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Case Name:	Amanda Hill v. Quicken Loans Inc.
Case Number:	5:19-cv-00163-FMO-SP

Filer:

Document Number: 92

Docket Text:

MINUTE ORDER IN CHAMBERS by Judge Fernando M. Olguin: Order Re: Further Proceedings, re: Stipulation for Hearing [91]. (twdb)

5:19-cv-00163-FMO-SP Notice has been electronically mailed to:

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